

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

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In re:  
NICHOLAS R. PAOLINO

Case No. 19-08193  
Chapter 13  
Judge Pamela S. Hollis

Debtors.

Confirmation hearing:  
6/07/2019 11:30 a.m.

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**CLUBLANDS OF JOLIET HOMEOWNERS ASSOCIATION'S OBJECTION TO  
CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN  
FILED MARCH 27, 2019**

Now comes a certain Creditor, CLUBLANDS OF JOLIET HOMEOWNERS ASSOCIATION, by and through its attorney, Benjamin J. Rooney of Keay & Costello, P.C., and for its objection to Debtor's chapter 13 plan filed March 27, 2019 states as follows:

1. Clublands of Joliet Homeowners Association is a claimant-creditor of the Debtor and brings this motion pursuant to 11 U.S.C. 1324 and 1325.
2. On April 18, 2019, Clublands of Joliet Homeowners Association filed its proof of claim with respect to Debtor's obligation to pay association assessments for the property located at 7613 Sugar Maple Drive, Plainfield, Illinois 60586. (Exhibit "A").
3. That pursuant to Clublands of Joliet Homeowners Association's governing documents, which have been recorded with the Recorder of Deeds of Kendall County, Illinois, a lien attaches to the property of the Debtor to secure unpaid assessments and other obligations arising out of ownership of a unit under the jurisdiction of Clublands of Joliet Homeowners Association.

4. At the time Debtor filed the chapter 13 petition on March 22, 2019, Debtor owed the amount of \$1,522.40 for past due assessments, late fees and attorney fees to Clublands of Joliet Homeowners Association. (Exhibit "A").

5. Debtor's plan fails to fully and properly account for Clublands of Joliet Homeowners Association's secured interest in the subject real estate and the pre-petition arrearage.

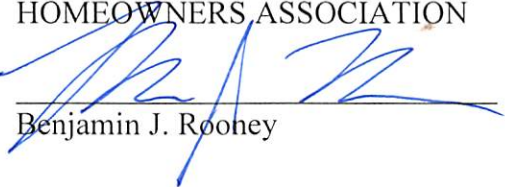
6. As a result of Clublands of Joliet Homeowners Association's lien rights in Debtor's real estate and the proof of claim filed on April 18, 2019, Clublands of Joliet Homeowners Association, should be included in Debtor's chapter 13 plan as a secured creditor in the amount of \$1,522.40.

7. As a result of Debtor's failure to fully account for the pre-petition secured debt owed to Clublands of Joliet Homeowners Association, confirmation of Debtor's March 27, 2019 plan should be denied.

WHEREFORE, Clublands of Joliet Homeowners Association prays this court for entry of the attached order denying confirmation of the Debtor's plan filed March 27, 2019, and for any such other and further relief as this court deems just and equitable within the premises.

CLUBLANDS OF JOLIET  
HOMEOWNERS ASSOCIATION

By:



Benjamin J. Rooney

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